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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES <i>ex rel.</i> BONNIE	)	NO. CV 08-3411 WHA (DMR)
LAMMERS, M.D.,	)	
	)	<b>STIPULATION OF DISMISSAL;</b>
Plaintiff and Relator,	)	<del>[PROPOSED]</del> ORDER
	)	
v.	)	
	)	
FARIDEH HEIDARPOUR, <i>et al.</i> ,	)	
	)	
Defendants.	)	

Subject to the Court's approval, and pursuant to Fed. R. Civ. P. 41(a)(2), IT IS HEREBY STIPULATED by the United States of America, *qui tam* Relator Bonnie Lammers, and Defendants Michael Hebrard, M.D., Richard Lavigna, D.P.M., Advanced Physical Medicine & Rehab Group, Inc., Advanced Occupational Rehabilitation, Inc., Advanced Medicine and Rehabilitation of Texas, Inc., and Advanced Medicine and Rehabilitation of Texas, P.A., that this action is dismissed with prejudice.

1. This action named nine Defendants. The three Defendants not listed above (Defendants Farideh Heidarpour, Ali Heidarpour, and A.B.C. Billing, Inc.) were dismissed from this case by Order dated September 8, 2015, after those Defendants paid the amounts due under their August 28, 2013 settlement agreement.

2. The remaining Defendants have now paid the amounts due under their July 11, 2012 settlement agreement, and they are being dismissed with prejudice, pursuant to the terms of the July 11, 2012 settlement agreement. Accordingly, the entire case is now being dismissed with prejudice.

IT IS SO STIPULATED.

Respectfully submitted,

BRIAN J. STRETCH  
Acting United States Attorney

Dated: February 1, 2016

By:                     /s/ signature on file                      
SARA WINSLOW  
MELANIE L. PROCTOR  
Assistant United States Attorneys  
Attorneys for the United States

MCBREEN & SENIOR

Dated: February 1, 2016

By:                     /s/ signature on file                      
MATTHEW WESTON  
Attorney for Relator

LAW OFFICES OF DENISE EATON-MAY

Dated: January 18, 2016

By:                     /s/ signature on file                      
DENISE EATON MAY  
Attorney for Defendants Michael Hebrard, M.D.,  
Advanced Physical Medicine & Rehab Group, Inc.,  
Advanced Occupational Rehabilitation, Inc.,  
Advanced Medicine and Rehabilitation of Texas,  
Inc., and Advanced Medicine and Rehabilitation of  
Texas, P.A.

KNIGHT EMPLOYMENT LAW

Dated: January 21, 2016

By:                     /s/ signature on file                      
CODY D. KNIGHT  
Attorney for Defendant Richard Lavigna, D.P.M.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that this action is dismissed with prejudice.

IT IS SO ORDERED.

Dated: February 2, 2016.

A handwritten signature in blue ink, appearing to read "Wm Alsop", is written over a horizontal line.

HONORABLE WILLIAM ALSUP  
United States District Judge